

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7 25 FUNSTON ROAD KANSAS CITY, KANSAS 66115 Solfrella Rus

file

APR 2 2 1985

MEMORANDUM

SUBJECT: Transmittal of Inspection Report

FROM:

Robert B. Dona

Chief, Field Investigations Section, EMCM/ENSV

T0:

Michael J. Sanderson Chief, AWCM/ARWM

This memorandum transmits the following RCRA compliance inspection report as performed by the Field Investigations Section, Environmental Monitoring and Compliance Branch, Environmental Services Division.

Facility

EPA I.D. Number

Activity No.

Areas of Non-Compliance

Henry Wurst, Inc. North Kansas City, MO.

non-notifier

ALF03

none

Attachment

RECEIVED

APR 2 2 1985

AIR AND HAZARDOUS MATERIA

R00126784
RCRA RECORDS CENTER

#### REPORT OF RCRA COMPLIANCE INSPECTION

AT

HENRY WURST, INCORPORATED
1331 Saline
North Kansas City, Missouri 64116

EPA ID NUMBER: NON-NOTIFIER

BY

U. S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

#### INTRODUCTION

At the request of the Air and Waste Management Division, a RCRA compliance evaluation inspection was performed at Henry Wurst, Inc., in Kansas City, Missouri, on April 10, 1984. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This narrative report and attachments present the results of the inspection.

### PARTICIPANTS

Henry Wurst, Inc.:
John C. Wurst, President
Charles J. Robinson, Plant Engineer

Missouri Department of Natural Resources: Steven Johnson, Environmental Specialist

U. S. Environmental Protection Agency (EPA): Jo Lynne Moore, Environmental Scientist, Inspector

#### INSPECTION PROCEDURES

Upon arrival at the facility, I requested an audience with Mr. John Wurst, the President of Henry Wurst, Inc. Mr. Johnson and I introduced ourselves and I explained the purpose and procedure of the inspection. Mr. Wurst referred us to Mr. Charles Robinson, the Plant Engineer. Introductions were made, credentials presented and I explained the purpose and procedure of the inspection. The inspection consisted of discussions of facility operations, waste management, confidentiality and a tour of the facility. Mr. Robinson provided compliance information and conducted the tour. No confidential information was received or discussed during the inspection.

#### FACILITY DESCRIPTION AND FINDINGS

Henry Wurst, Inc. is a web-offset lithographic business located along the -Missouri River in North Kansas City. The facility prints high volume items such as brochures, fliers and catalogues. The facility operates three shifts, twenty-four hours a day five days a week, employing approximately 250 people. Web-offset lithography involves the applying of a printed image to a cylinder where the inked image is transferred to a rubber blanket cylinder. In the same revolution, the blanket prints the wet inked image into the continuous roll of paper. The facility utilizes automated and computerized dual presses which print both sides of a web of paper simultaneously. Production of the printed item requires operations such as: design, film and plate preparation, ink formulation, printing, assembly (cutting, folding, and binding), and packaging.

### Photography

Images to be printed are photographed on sheets of film. The film is processed automatically in a closed-cycle system. The processor is cooled with non-contact water. The cooling water is discharged to the sewer and is periodically sampled for analytical testing by Kansas City personnel. Once a month, the film supplying company collects all scrap film and silver from the processors. The silver is reclaimed and the facility receives a percentage of the recycling commission. Mr. Robinson was unable to estimate the amount of silver generated.

# Plates

A separate printing plate is prepared for each color on the image. In the assembly area, the film is exposed directly on the aluminum photopolymer plates. Portions of the plate are masked off and a gum material is applied to the plate. The gum is applied to the plate dry in an automated unit. The plate is inspected for imperfections and particles, a solution is applied, and the plate and is baked. Damp spots are removed from the finished plate using cheesecloth. Approximately 75 aluminum photopolymer plates  $(2.5' \times 3.0')$  are used each day and collected for recycling.

# Printing Ink

All printing ink is supplied by an in-house distributor, Capital Printing Company, Inc., Washington, D. C. The ink is supplied in either 55-gallon drums or 30 pound pails. The majority of the printing jobs at Henry Wurst use ink from the routine stock consisting of yellow, blue, red, and black. Varying colors are formulated as needed from available inks. Material safety data sheets (MSDS) for the inks were not available for review at the time of the inspection. However, Mr. Robinson and the ink distributor representative were confident that the inks are formulated with organic pigments and not metals such as cadmium or chromium. Hydraulic pumps are used to draw ink from 55-gallon drums to the press fountains in approximately 60% of all printing jobs. In the other instances, the press fountains are filled by hand dipping ink from 30 pound pails. Unused portions of

ink are left in the pails, covered with a paper liner and sealed closed. This ink is stored for reuse in subsequent printing jobs. When preparing ink for use, the ink is removed from the paper liner and the bottom of the pail and mixed. The mixer is cleaned using naptha press solvent in a 5-gallon bucket. The cleaning solvent is reused and is replenished as needed. Empty pails and residual ink on the liners are disposed of as trash. Empty 55-gallon drums are sold to a local drum reconditioner, Great Lakes, Inc.

#### Roll Presses

During the printing process, the aluminum plates are automatically dampened with a water/surfactant solution. The solution is dispensed on a rolled towel which is routinely washed and reused. The printing plates are automatically or manually cleaned between runs. The automated plate cleaner uses water and detergent applied to a rolled towel. Waste rolled towels are discarded as trash. Manual cleaning of the plates is accomplished using a naptha solution applied to cloth wipers. The naptha evaporates during use and the wipers are laundered for reuse by a commercial service. Routine maintenance of the presses generates less than 100 gallons of lubricating oil per month. The waste oil is collected and stored outside in 55-gallon drums. Upon delivery of virgin oil, the supplier, Radiam Petroleum Company, collects the waste oil in their tank truck.

# Bindery

Operations in the bindery portion of the facility include wire stitching, saddle binding, gluing, custom ink jet printing, and packaging. Wooden pallets are reused or recycled. The facility owns one truck, but does not transport their own products.

# Other Waste

Waste paper is bundled and sent to a recycler. Solid waste is bundled separately for disposal e.g., cardboard is flattened and bundled, and scrap paper is shredded and bailed. Solid waste is collected by Belger Cartage Services Inc. and landfilled.

# CONCLUSIONS

According to the information provided concerning waste generation and disposal methods, Henry Wurst, Inc. is exempt from regulation under the Resource Conservation and Recovery Act.

Jo Lynne Moore

Environmental Scientist

Date: 4/18/85

Activity Number: ALF03

Robert B Dona

Robert B. Dona

Chief, Field Investigations Section

Date: 4-19-85

Soft.